

Judge Thomas S. Zilly
Trial Date: 04-19-21

IN THE U.S. DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BAO XUYEN LE, as Personal
Representative of the Estate of Tommy Le;
HOAI “SUNNY” LE; and DIEU HO,

Plaintiffs,

v.

REVEREND DR. MARTIN LUTHER
KING, JR. COUNTY; and KING
COUNTY DEPUTY SHERIFF CESAR
MOLINA,

Defendants.

NO. 2:18-cv-00055-TSZ

**STIPULATED MOTION & ORDER
TO MODIFY SCHEDULING ORDER
TO ALLOW FOR THE TAKING OF
THE DEPOSITION OF RICARDO
FUENTES AFTER THE DISCOVERY
COMPLETION DATE**

STIPULATION

The parties to this action through their attorneys of record ask the Court to confirm and order the following stipulation:

1. Pursuant to the September 21, 2020 scheduling order, the discovery completion deadline for this matter was February 1, 2021.

2. Defendant King County supplemented its discovery responses, on February 18, 2021, with newly discovered evidence, namely the “*Office of Law Enforcement Oversight, King County Sheriff’s Department, Officer-Involved Shooting Incident, January 14, 2017*”, (KCSO Summary).

3. The KCSO Summary was authored by Ricardo Fuentes, a former representative of the Office of Law Enforcement Oversight (OLEO).

**STIP. MOT. & ORDER TO
MODIFY SCH. ORDER - 1
NO. 2:cv-18-00055-TSZ**

CAMPICHE ARNOLD, PLLC
111 Queen Anne Avenue N., Suite 510
Seattle, WA 98109
TEL: (206) 281-9000
FAX: (206) 281-9111

4. Recognizing that the KCSO Summary is newly discovered evidence produced by Defendant King County after the discovery completion date and reserving to the Plaintiffs the future right to seek relief from the Court based on this newly discovered evidence and Defendant King County's post-discovery cut off supplement to discovery, the parties have agreed to modify the existing scheduling order to allow for the taking of the Deposition of Ricardo Fuentes.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

For the Plaintiffs

s/ Philip G. Arnold

Philip G. Arnold, WSBA No. 2675
 Jeffery M. Campiche, WSBA No. 7592
 Jeffrey J. Kratz, WSBA No. 55785
 Attorneys for the Plaintiffs
 CAMPICHE ARNOLD PLLC
 Attorneys for Plaintiffs Le family
 111 Queen Anne Avenue N., Suite 510
 Seattle, WA 98109
 Tele: 206.281.9000 Facsimile: 206.281.9111
 Email: jcampiche@campichearnold.com
 parnold@campichearnold.com
 jkratz@campichearnold.com
 lrichard@campichearnold.com
 lharris@campichearnold.com
 tlane@campichearnold.com

For Defendant Deputy Cesar Molina

s/ for Timothy R. Gosselin w/ permission

Timothy R. Gosselin, WSBA No. 13730
 Attorney for Defendant Molina
 1901 Jefferson Ave., Suite 304
 Tacoma, WA 98402
 Tele: 253-627-0684
 E-mail: tim@gosselinlawoffice.com

For Defendant King County

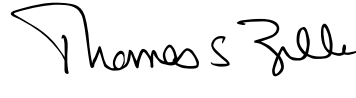
s/ for Daniel L. Kinerk w Permission

Daniel L. Kinerk, WSBA No. 13537
 Carla Carlstrom, WSBA No. 27521
 Senior Deputy Prosecuting Attorneys
 Attorneys for Defendant King County
 King County Prosecuting Attorney's Office,
 Civil Division
 500 Fourth Avenue, Suite 900
 Seattle, Washington 98104
 Tele: 06-296-8820
 Email: dan.kinerk@kingcounty.gov
 carla.carlstrom@kingcounty.gov
 jennifer.klein@kingcounty.gov
 rmunozcintron@kingcounty.gov

ORDER

Pursuant to stipulation between Plaintiffs and Defendants King County and Deputy Molina, it is so ordered.

DATED this 23rd day of February, 2021.



Thomas S. Zilly
United States District Judge

Presented by:

s/ Philip G. Arnold

Philip G. Arnold, WSBA No. 2675

Attorneys for the Plaintiffs

CAMPICHE ARNOLD PLLC

Attorneys for Plaintiffs Le family

111 Queen Anne Avenue N., Suite 510

Seattle, WA 98109

Tele: 206.281.9000 Facsimile: 206.281.9111

Email addresses: jcampiche@campichearnold.com

parnold@campichearnold.com

jkatz@campichearnold.com

lrichard@campichearnold.com

lharris@campichearnold.com

tlane@campichearnold.com